



STATE OF UTAH
NATURAL RESOURCES
Wildlife Resources

Norman H. Bangerter, Governor
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Southeastern Region • 455 West Railroad Avenue • Price, UT 84501-2629 • 801-637-3310

March 23, 1988

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Mr. Melvin A. Coonrod
Environmental Industrial Supply
P.O. Box 258
Elmo, UT 84521

Dear Mel:

In regards to Beaver Creek Coal Company's request for you to assist them at conducting an annual raptor survey, the following is offered for your consideration.

Annual surveys for permitted facilities are not normally required. Where raptor nests are known to exist within one-half mile of surface disturbed areas/facilities, annual monitoring to determine the status of just those nests was recommended during the first 5-year permit period. Once the impacts, if any, from a coal facility on a raptor nest are established, monitoring could be discontinued.

From a planning perspective, there is value for a coal company to conduct at least one permit-wide survey every five years on their actively mined property. This would facilitate future and appropriately timed surface disturbing developments. When adequate historical data is not available and a new surface disturbing development is planned at a coal mining complex, a raptor survey within one-half mile radius of such may be recommended.

Personnel conducting a survey during the raptor breeding season, which lies between early February and mid August, and who approach within one-half mile of a nest are required to secure a "Certificate of Registration" from the Division. Survey work that is accurate and comprehensive always results in disturbance (harassment) to the birds. Such is not allowed without appropriate authorization. A certificate of registration will only be issued to a qualified raptor ecologist and for a specific survey area. Additionally, the survey technique will require Division approval before the certificate is issued. Generally speaking, precipitous terrain will require use of a helicopter during mid May and a biologically trained backup observer must accompany the raptor ecologist. Survey of arboreal areas can be conducted on-the-ground by a raptor ecologist. On-the-ground survey must occur prior to leaf-out.

Mel, adequate baseline raptor data exists for Beaver Creek's Trail Mountain and Huntington Canyon (Mill Fork) properties due to an intense helicopter survey in May of 1987. Also, the Mill Fork properties have undergone final

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reclamation. No raptor survey work is needed in association with the Castle Valley loadout project due to a lack of raptor nesting habitat and the already existing facility. The 3/6 mines in the Gordon Creek area (Coal Canyon) have also undergone final reclamation, thus no raptor survey is needed. The 2/7 mines in the Gordon Creek area remain in an actively developing mining project. The small amount of precipitous terrain associated with the permit area has potential for raptor nests. Also, the arboreal areas on that permit tract have a potential for raptor nests. Neither setting has been adequately surveyed in recent years. If the company has plans to expand into undisturbed areas, a comprehensive survey during this spring (1988) would behoove their interests. If no such plans exist or have potential to arise, there is no justification for a survey.

I hope this assessment will provide the needed guidance for Beaver Creek Coal Company's decision. If a decision to conduct inventory is made, a helicopter doing such work will be in the area in May. Coordination with DOGM (AMR Program) and possibly Castle Gate Coal Company could reduce cost for such an inventory. Please advise if I can be of further assistance.

Thank you for an opportunity to provide comment.

Sincerely,



Larry B. Dalton, Resource Analyst
Southeastern Region

LBD/dd

cc: Darrell Nish, DWR
Randy Radant, DWR
Lowell Braxton, DOGM
CLark Johnson, USFWS

Utah Division of Oil, Gas and Mining
Standards and Procedures for Raptor Surveys

The following should be considered a supplement to the Division's Fish and Wildlife Information Guidelines and will be incorporated into those guidelines when they are revised.

Before the Survey:

1. Consult with the Division to determine if a survey is necessary. This contact may be part of the normal wildlife consultation process for permit submission. If a survey is required, the following are general guidelines for surveys:
 - a. New mine permit or activity involving long term disturbance: The minimum requirement for baseline information is a survey of suitable habitat within a .5 mile radius of surface disturbing construction or operations activities. Surface disturbance includes potential areas of subsidence on cliffs.

A baseline survey of the entire permit area is recommended to prevent delays for clearances on amendments and permit renewals and may be required by the Division. Follow-ups on baseline surveys may be required for five year permit renewals.
 - b. Short term disturbances, e.g. small construction projects or exploration: If disturbance is to occur in the breeding season of February 15 to July 15, survey suitable habitat within .5 mile radius of the disturbance. If there will be no disturbance during the breeding season, surveys can usually be limited to the actual disturbance site.
 - c. Monitoring: Monitoring studies (i.e. methods, locations, scheduling) should be developed on a site by site basis. Except for special situations, survey flights are not required of the entire permit area or of all known nests. Monitoring will usually include reporting on known and new nests in the .5 mile buffer area around disturbances.
2. Contact (a) the Resource Analyst at the appropriate regional office of the Utah Division of Wildlife Resources; (b) the Field Supervisor, U.S. Fish and Wildlife Service, RM 2060, 1745 W. 1700 So., Salt Lake City, Utah 84104; and (c) the office of the appropriate federal land management agency, if applicable, for their most recent data on area raptors.

These state and federal agencies share information on raptors but one or more may have different data if recent work has been done by an agency.

Baseline Survey:

1. In most cases a helicopter is necessary for a baseline survey of cliff raptor habitat or any large scale survey of tree nesting species. Fixed wing aircraft cannot, generally, fly slow and close enough for an adequate survey. Ground monitoring may be useful after nest areas are identified but should not be considered a substitute for baseline data collection from a helicopter.

Water Monitoring Report 1987

The majority of the water monitoring report was submitted December 12 1987 to Mr. Tom Munson. As a result of that submittal, the following data was requested:

Underground and surface water consumption based on estimates of known usage and calculated utilizing moisture content of mined coal, Department of Health Guidelines [domestic usage] and a survey of underground equipment by Blackhawk Engineering. The results of that survey are as follows:

1. Surface coal handline [dust control]	480,000 gal.
2. Road watering	299,700 gal.
3. Bath house	164,000 gal.
4. Residential	<u>36,500 gal.</u>
	980,200 gal.
5. Underground consumption as calculated by Blackhawk Engineering:	
312,000 tons @ 2.5 gallons per ton	<u>780,000 gal.</u>

Total estimated usage of underground water in 1987	1,760,200 gal.
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The Flow Data for Huntington spring is attached as supplied by the Special Service District and listed on the reports as "Big Bear Spring". See Appendix 2, this report.